

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

No. 18-CR-03989 WJ

vs.

ALLISTER QUINTANA,

Defendant.

DEFENDANT'S SEVENTH UNOPPOSED MOTION TO EXTEND DEADLINES

Defendant Allister Quintana, through his attorney, Ray Twohig, moves that deadlines for counsel to file sentencing memoranda be extended and that the sentencing hearing be vacated and rescheduled. The grounds are as follows.

1. Several sentencing dates have been set, then modified. The current sentencing date is April 6, 2021.
2. At the time of the court's orders rescheduling this matter, the Court set deadlines for counsel's submissions. Those deadlines have not been able to be met for various reasons. Earlier, it was because the report of Dr. Christine Johnson, Ph.D had been delayed. Then, after it was completed, communications with Mr. Quintana and counsel became logistically complicated further, by both the pandemic and technical difficulties with Zoom calls.
3. The Sixth Motion for Extension (Doc 80) advised that "meetings between client and counsel and Ms. Gordon have been frequent, and more are needed because of

some unique aspects of the case which require particular focus, and which were better revealed to counsel and Ms. Gordon as a result of Dr. Johnson's report."

4. Defense counsel's communications with Mr. Quintana have yielded further information which has required that counsel seek additional research, investigation and expert assistance. We expect that an additional month or more of delay is likely. Defendant's attorney has provided certain documents to the Government to facilitate further discussions, and to minimize future inconvenience and enable a more streamlined sentencing proceeding. Defendant seeks an extension to May 15, 2021 to complete his sentencing memorandum and the Government can complete its response by May 29, 2021.
5. Extension of the deadlines is requested as well as rescheduling the sentencing in this matter.

Assistant United States Attorney Joseph Spindle does not oppose this motion.

Respectfully submitted,

/s/ Ray Twohig

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I hereby certify that on the 29th day of March, 2021, I filed the foregoing electronically through the CM/ECF system, which caused all parties and counsel of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Ray Twohig

Ray Twohig